

pluralities of objects, respectively, to implement said first and second financial products, respectively.

34 (amended). The method of claim 29 further comprising the step of [dividing] separating said first and second financial products [with] based upon a key value.

35 (amended). The method of claim 34 wherein said key value corresponds to a business unit.

REMARKS

This communication is responsive to the Office Action dated September 28, 2001. By this response, Applicant has amended claims 20, 29 and 34-35. Sixteen claims (3 independent and 13 dependent) remain pending in this Application. Support for the amendments is found in the Specification and claims originally filed. No new matter is added by this Amendment. Applicant believes that no fee is required by this response; should any fee be necessary, however, the Commissioner is authorized to deduct such fee from Deposit Account 19-2814. **This response is being filed by facsimile, with a confirmatory copy being sent via first class mail.**

Objections to the Drawing Figures

Applicant has amended the Specification to correct various typographical errors and to eliminate the language objected to by the Examiner. While Applicant has not amended the drawing figures by this response, Applicant respectfully believes that the objections to the drawing figures are now moot in view of the corrections to the Specification. Reconsideration of the rejections to the drawing figures is therefore requested.

Applicant notes that the "repository" element recited in claim 29 is disclosed in at least Figure 8, element 144, and in the accompanying text. Applicant has corrected the Specification to fix the typographical errors referencing element 114.

Section 112 Objections

Applicant has amended the claims to address the Section 112 objections set forth in the Final Office Action. The amendment to claim 34 is enabled at least in page 19, lines 8-19 of the Specification as originally filed. Reconsideration of the rejections is respectfully requested.

Prior Art Rejections

The Office Action rejects all claims under Section 102(e), citing United States Patent No. 6,226,623 ("Schein"). Applicant respectfully traverses the rejection in that the Schein reference fails to incorporate each and every limitation found in the present claims.

As a preliminary matter, the first Office Action rejected a number of then-pending claims, citing the Schein reference. Applicant's response to the first Office Action pointed out that Schein fails to disclose each and every element of the recently-added claims 20-35. The final Office Action does not substantively address Applicant's comments with regard to the Schein reference, stating that such comments were moot in view of the new claims provided with Applicant's first response. Applicant therefore respectfully repeats its assertions set forth in the prior response that the Schein reference fails to anticipate each and every element of the present claims, in particular the element of "*stored value products compris[ing] a plurality of objects retrieved from a database/repository*", as recited in the present claims.

As set forth in the present claims, various embodiments of the invention relate to systems, servers and a methods of managing stored value (e.g. smartcard) transactions. Various stored value products are supported on a common server, which includes a database or repository of data objects. These objects may be retrieved from the database/repository and suitably combined in various fashions to create multiple stored-value products, all interacting with the common data. Because common objects are used in multiple products, numerous benefits are achieved, as set forth in the Specification.

In contrast to the claimed invention, however, the Schein reference makes no mention whatsoever of objects or of a repository of objects. Indeed, the only inclusions of the word "object" in the Schein reference refer to "objects of the invention", and not to any sort of

programming object, data object or the like. To the contrary, Schein describes a communication and messaging network for use by a bank (see, e.g., col. 9, lines 1-13). The system allows customers to access various personal banking information (including checking and savings accounts, investment accounts, mortgages and the like) from branch offices or from home via telephone, personal computer, etc. (see, e.g., col. 10, lines 14-27). The Schein reference also describes a central database that stores information about a customer's various accounts in a central location (see, e.g., col. 10, lines 41-56) so that the bank can use the customer information for financial analysis and marketing purposes (col. 11, lines 1-10).

The Schein reference does not, however, disclose a system or method for creating or operating multiple stored value products, as recited by the various claims of the present Application, nor does Schein expressly or impliedly disclose the use of objects. Indeed, the language from the Schein reference cited by the Final Office Action as disclosing "a plurality of objects" (col. 7, lines 13-33) is a mere list of conventional bank products such as deposits, loans, mortgages, and the like; this language makes no mention of objects or of objects configured to implement such products. Schein makes no mention whatsoever of programming objects that may be retrieved from a database/repository and used in conjunction with a plurality of stored value programs, as recited in the present claims.

Further, the Schein reference is not concerned with building or operating stored value products, and as such would have no need for a database or repository of objects suited for such a purpose. Accordingly, the Schein reference fails to expressly or impliedly disclose at least a system *"wherein each of said stored value products comprises a plurality of objects retrieved from said database, and wherein each of said plurality of objects provides a function that is available to each of the plurality of stored value products such that each of said plurality of stored value products is allowed to retrieve said customer data and said merchant data from said database"*, as recited in claim 20. Similarly, the reference fails to disclose each and every element of independent claims 28 and 29, particularly a database or repository including a plurality of objects. Accordingly, the cited reference fails to anticipate the claimed invention, and reconsideration is respectfully requested.

Because the Schein reference fails to anticipate each and every element of the independent claims, the dependent claims are believed to be patentable a fortiori, and a

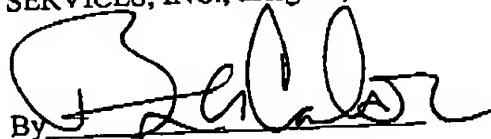
detailed response to each of the dependent claim rejections is not necessary at this time. Nevertheless, Applicant reserves the right to independently demonstrate the patentability of any element found in the dependent claims at a later date.

Conclusion

In sum, Applicant respectfully submits that the present application is in condition for allowance, and earnestly solicits a Notice of Allowance at the Examiner's earliest convenience. The Examiner is invited to telephone the undersigned if such would advance prosecution of this Application in any way.

Dated this 7th day of May, 2001.

Respectfully submitted on behalf of
AMERICAN EXPRESS TRAVEL RELATED
SERVICES, INC., assignee,

By 

Brett A. Carlson
U.S. Reg. No. 39,928

SNELL & WILMER L.L.P.
One Arizona Center
Phoenix, AZ 85004-2202
Phone: (602) 382-6236
Fax: (602) 382-6070
bcarlson@swlaw.com